

EPA Direction to LWG on Production of Draft Final Remedial Investigation Report for the Portland Harbor Superfund Site

April 27, 2015

The following provides specific, but not all, direction to the LWG in completing the RI report. There are additional directions (either remaining comments by EPA or Integral) provided in the clean version of the text or in other attached files that are to be incorporated into the draft final RI report. EPA may provide additional direction once the LWG has provided a draft final report with all these comments incorporated and EPA has a chance to review the document in its entirety. EPA expects that the LWG will conduct all necessary editing (e.g., removal of redundant words, correcting spelling errors, correcting sentence structure) and formatting to the document when putting the sections together to produce the draft final RI report.

1. Incorporate all text revisions in attached Word documents. We have provided both redline and clean copies of the text, except Sections 2, 9, and the Executive Summary which are only provided in clean copy.
2. Verify that only acronyms in the final version of the report are provided in the list of acronyms. The acronym LWR is not to be used in the report and is to be replaced globally throughout the report with "lower Willamette River."
3. Make sure units are consistent throughout report.
4. Use consistent terminology throughout report (e.g., if using Total DDx in one section, then use that description in all sections).
5. Attempt to identify and resolve discrepancies in the report. Noted discrepancies have been provided in the text.
6. Change "undetected" to "not detected" throughout report.
7. Update description of Appendix H in Section 1.
8. Ensure references to all sections, appendices, maps, tables and figures are correct throughout the entire report.
9. EPA has provided copies of figures, tables, and maps as examples for those to be produced by the LWG for the draft final RI report. The LWG may use more updated versions of these in the draft final RI report. It is acceptable for the LWG to extract any imbedded tables, maps, and figures from the text and present them consistent with other tables, maps and figures in the report.
10. Include the data reports listed in the attached document provided by the LWG in electronic format only as Appendix A5 in the draft final RI report.
11. Combine text within a section into one file (e.g., combine text files for Section 5 into one file).
12. Include only references to documents cited in the report. References cited in appendices are to be included at the end of each appendix.
13. Ensure that RI database is accurate and that all data used for the RI are included in the final RI database. Noted missing information includes upriver dioxin/furan congener data, bioassay results, and results of the LRM and FPM.
14. If the LWG notes errors in values in Section 5, please correct and note those errors in a separate documented list when providing the draft final RI report to EPA.
15. Change "IC" to "indicator contaminant" throughout report.

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16. Change “ug” to “µg” when referring to micrograms throughout report.
17. Replace “subaverage” with “average” throughout Appendix E.
18. Ensure that all referenced links to internet pages are still valid. Update invalid links or provide copy of page and date downloaded as reference.
19. Include a table of contents, list of figures, list of maps, and/or list of tables, as appropriate, at the beginning of each appendices.
20. Background statistics shall not be calculated for those analytes where the frequency of detection was less than 50 percent (for example, butylbenzyl phthalate, naphthalene, and phenanthrene).
21. Either remove the data analyzed by method SOM01.2 for hydrocarbons prior to conducting background calculations or do not conduct background calculations for hydrocarbons as there are too few detections in the data set (see comment 20). Although the results for PAH compounds exhibit detections limits consistent with other methods, all reported detections are estimated, and the majority of the detection limits themselves appear to be estimated. The frequency of detection for PAHs was exceedingly low (2/19 for benzo(a)pyrene, 1/19 for naphthalene, and 2/19 for phenanthrene). If the LWG is confident that the anthropogenic background for these PAHs in this reach of the river is essentially below detection, then the data should continue to be included.
22. The order of presentation shall be properly alphabetized. Carcinogenic PAHs are PAHs and shall be abbreviated as cPAHs. Analytes are not “total”, so alphabetize by the chemical name.
23. For hexachlorobenzene, only use the data analyzed using method SW-8081A in conducting background calculations.
24. The calculation of the UCL and BTV shall be consistent with the dispute decision. For example, following the removal of outliers, the data for cPAHs appear to fit normal, lognormal, and gamma distributions. Yet the LWG chose a BTV calculated assuming a lognormal distribution and a UCL calculated assuming a normal distribution. The BTV and UCL shall both be calculated assuming the same distribution, and preference given to methods consistent with a normal distribution when the data appear to fit a normal distribution following the removal of outliers.
25. OC-corrected values shall be calculated using a TOC of 1.71 percent for the site, consistent with what was done in Section 7 of the RI and in the dispute decision. Further, Table H2b shall present only OC-corrected values with outliers removed.